

April 7, 2009

Department of Commerce
National Telecommunications and Information Administration
1401 Constitution Avenue, N.W.
Washington, DC 20230-0002

Re: Comment on ARRA Broadband Grant Program

Norwich Public Utilities is a municipally-owned gas, electric, water, and wastewater utility in Connecticut which has recently installed a fiber backbone network that we would like to expand. Norwich is a distressed city which has not received a great deal of attention from private providers of broadband and many of our residents live below the poverty line and cannot afford the services which are available.

Given tight budgets, we have pursued a broadband deployment in phases. The first phase, just completed, included construction of three fiber backbone loops to serve the utility, city agencies, schools, the library and the local hospital. We have in place a fully developed plan for several more phases to expand services. We will be seeking funding to enhance the services provided in Phase I and implement Phase II of the plan, which includes:

- ✓ In partnership with our community hospital, provide high speed, high capacity communications between the hospital, physicians' offices and laboratories to implement a community health record.
- ✓ In partnership with a local Internet Service Provider (ISP), build out the fiber network combined with broadband over power line (BPL) to high density, low-income and senior housing complexes for broadband Internet services.
- ✓ In partnership with the local schools, fire department, and police department acquire the hardware and software necessary to implement several public safety applications, including communications, traffic control, police/fire communications with schools and private sector emergency services.
- ✓ In partnership with schools and economic development agencies acquire the hardware and software necessary to implement job training and workforce development.
- ✓ In partnership with the public housing authority, local hospital, and support agencies, acquire the hardware and software necessary to enhance the monitoring of the aging population.

Having just completed Phase I and with a well developed plan in hand and contractor relationship in place, Norwich Public Utilities is limited in our ability to undertake the next phase solely based on budget cut backs. As we read the legislation, the Broadband Services Grants are targeted to just such projects.

With the help of a grant, we could rapidly complete the build out, implement the education and public safety initiatives in our plan, and proceed with our ultimate goal to lease a portion of the backbone fiber to several private sector service providers who would agree to sell services at lower cost and with greater functionality than is now available, thereby serving the entire community. Completion of this phase would provide a sustainable infrastructure and solidify the business relationships needed to ensure the long term sustainability of broadband capabilities for city agencies, residents, and the business community in Norwich.

In completing the grant guidelines and requirements we ask that you consider the following points.

1. In the past 18 months we have invested over \$3.5 million in the first phase, which provides the foundation for economic development, job creation, education enhancements and medical advancement. We suggest that recent investments in fiber infrastructure and networking equipment be allowed as part of the 20 percent match.
2. To fully capture the potential benefits of fiber infrastructure we suggest that investments in electronics and enabling applications be included in the eligible expenditures for grant funding.
3. We suggest that investments in internal wiring and routing equipment be included in the eligible expenditures for funding.
4. We suggest that preference be given to fiber-based projects that advance broadband capacity and speed well beyond DSL and cable modem performance.

We look forward to the release of definitions and proposal guidelines and requirements.

Sincerely

A handwritten signature in black ink, appearing to read 'John Bilda', with a stylized flourish at the end.

John Bilda
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